

## REMARKS

Applicants and Applicants' attorney express appreciation to the Examiner for the courtesies extended during the recent interview held on October 6, 2004. The amendments and arguments presented in this paper are consistent with the proposed amendments and arguments discussed during the Interview. Claims 47-64 are pending, of which claim 47 is an independent system claim and claims 54, 56, 57, and 61 are independent method claims. As indicated above, claims 47 and 54 have been amended by this paper.<sup>1</sup>

The Office Action rejected independent claims 47, 54, 56, and 57 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,119,476 to Texier ("*Texier*") in view of "The Complete HyperCard Handbook" by Goodman ("*Goodman*") and "Perform Pro expands simple WYSIWYG form design, filing" ("*Perform Pro*"), and rejected independent claim 61 under 35 U.S.C. § 103(a) as unpatentable over *Texier* and *Goodman* in view of U.S. Patent No. 5,119,476 to McCaskill ("*McCaskill*"). Each of the remaining dependent claims was rejected as unpatentable in view of *Texier*, *Goodman*, *Perform Pro*, and/or *McCaskill*, in various combinations.<sup>2</sup>

Applicants' invention, as claimed for example in independent method claim 54, relates to presenting data collected from custom forms in a data processing system. The method retrieves a form data structure for a form that has a field object with one or more attributes for each field of the form. The one or more attributes comprise at least one of (i) an inform attribute to indicate that a notification is sent whenever the field is affected by a user event, (ii) a group attribute to indicate that the field is in a particular attribute group for enabling or disabling the field based on any other fields within the particular attribute group, or (iii) an idle attribute to indicate that a form control procedure for the form is called periodically. The method also retrieves a form control procedure for providing custom behavior indicating user-defined operations associated with the fields of the form. For each field of the form, the method invokes the form control procedure, specifies the field, and receives input data through an input device. For received input data, the method invokes the form control procedure, and specifies the input data and an

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<sup>1</sup>Support for the amendments can be found throughout the Specification, and particularly beginning at line 8 of page 7 and beginning at line 20 of page 9.

<sup>2</sup>Although the prior art status of all cited art is not being challenged at this time, Applicants reserve the right to do so in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of the cited art.

indication of field to which the input data is directed, so that the form control procedure can override the standard behavior of the field. For each field of the form, the method further invokes the form control procedure and specifies the field to prepare data directed to the field for presentation. The method presents the prepared data according to the form control procedure. Independent claim 47 is a system claim, but recites similar limitations.

Applicants' invention, as claimed for example in independent method claim 56, relates to collecting data in a data processing system for displaying a plurality of forms developed by a user. For each of the forms, the method stores a form control procedure and a data description, as opposed to a program instruction description, of the fields of the form, including field placement, in a form data structure, the form control procedure for overriding the standard behavior associated with each of the fields. The method selects one of the plurality of forms, retrieves the form data structure for the selected form, and for each of the fields of the selected form, invokes the form control procedure of the retrieved form data structure to control the displaying of the field on the display device. For each of a plurality of fields of the selected form, the method receives user input from the input device, the user input being directed to the field, invokes the form control procedure of the retrieved form data structure and passes to the form control procedure the received user input and an indication of the field to which the user input is directed. The form control procedure determines whether to override the standard behavior of the field to which the user input is directed. If the form control procedure determines to override the standard behavior, the method performs a custom behavior for the field to which the user input is directed, the custom behavior indicating user-defined operations associated with the fields of the form, and returns an indication as to whether the standard behavior has been overridden. The method performs the standard behavior for the field only if the standard behavior has not been overridden. With respect to returning an indication as to whether the standard behavior has been overridden or should be performed, independent method claims 57 and 61 recite similar limitations.

*Texier* discloses the use of programming instructions to generate windows to be displayed on a computer screen. Col. 2, ll. 61-68. To fill information into a form field, *Texier* discloses a variety of editors. Col. 8, l. 23 – col. 10, l. 17. The editors manage their output, including the validation of the filled information. Col. 8, ll. 10-12.

*Goodman* discloses instructions for using HyperCard, including authoring HyperCard stacks for managing information. See "Introduction to Authoring" beginning on p. 85. Chapter 9, beginning on page 129, and chapter 10, beginning on page 161 disclose adding fields and buttons to cards, respectively.

*Perform Pro* is a high-level product review for a form designer. *Perform Pro* discloses a toolbox and various menus for designing forms, but does not include any details regarding the technology used to describe the fields of a form.

*McCaskill* discloses a method for controlling the editing order of cells in a spreadsheet by evaluating a next cell attribute of a current cell. Figure 4. The next cell attribute of a cell simply indicates which cell should be edited next when a next cell key is pressed by the operator, in contrast to using a cursor motion key to indicate that the next cell to edit is in one or four directions relative to the current cell. Col. 3, l. 64 – col. 4, l. 1.

"To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation . . . to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 2143.

With respect to independent system claim 47, the Office Action asserts that *Texier's* "SEE/MODIFY EMPLOYEE" query option is used to query a database, and therefore the query option can be interpreted as a "pack attribute" that causes the retrieved query result data to be packed into a user input structure for display. See Office Action, p. 4 (rejection of claim 47). Independent method claim 54 is rejected based on the same rationale with explicit reference to the rejection of claim 47. Although Applicants do not necessarily agree with this analysis, Applicants have amended claims 54 and 47 to remove the "pack attribute" from the recited list of alternative attributes and to further explain the purpose of the group attribute. None of the remaining alternative attributes in the list, the inform attribute, the group attribute, or the idle attribute, was addressed in the Office Action. Accordingly, Applicants respectfully submit that *Texier*, *Goodman*, and *PerForm Pro* fail to teach or suggest all the claim limitations, and therefore the rejection of independent claims 47 and 54 under 35 U.S.C. § 103(a) should be withdrawn.

In rejecting independent method claims 56 and 57, the Office Action asserts that *Texier* teaches running validation checks (a custom behavior) on a blank field before performing user

input on the field (a standard behavior), providing the benefit of a highly adaptable database. *See* Office Action, p. 7 (rejection of claim 56) A similar assertion is made in rejecting independent method claim 61. *See* Office Action, p. 10 (rejection of claim 61).

Applicants respectfully disagree with this analysis, but note that even if receiving user input corresponds to standard behavior and validation corresponds to custom behavior as asserted in the Office Action, *Texier* does not teach, prior to performing the standard behavior (receiving user input), invoking a form control procedure and passing the received user input and an indication of the field to which the user input is directed. Indeed, how can the received user input be passed to the form control procedure prior to the standard behavior (receiving user input) even being performed? Of course it can't, and therefore, even assuming for the sake of argument that *Texier* can be read as asserted in the Office Action, this reading of *Texier* does not satisfy the limitations recited in independent claims 56, 57, and 61. Accordingly, the rejection of independent claims 56, 57, and 61 under 35 U.S.C. § 103(a) should be withdrawn.

Taken one step further, *Texier* also would need to teach that the validation (custom behavior) is performed prior to receiving user input (standard behavior) and that receiving user input (standard behavior) is performed only if it has not been overridden, as indicated by a returned indication as to whether the standard behavior has been overridden. Where does *Texier* teach returning an indication as to whether the standard behavior (receiving user input) has been overridden prior to performing the standard behavior (receiving user input)? In other words, if receiving user input is substituted for standard behavior and validation is substituted for custom behavior in each of independent claims 56, 57, and 61, it becomes clear that *Texier* contains no corresponding teaching. Here too, even assuming for the sake of argument that *Texier* can be read as asserted in the Office Action, this reading of *Texier* does not satisfy the limitations recited in independent claims 56, 57, and 61, and therefore the rejection of independent claims 56, 57, and 61 under 35 U.S.C. § 103(a) should be withdrawn.

The Examiner seemed to concur with this analysis during the Interview and noted in the Interview Summary that the proposed amendments and arguments appear to overcome the cited art of record, but that further search and/or consideration will be necessary pending submission of a formal response.

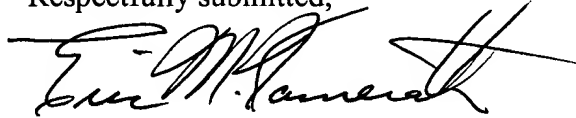
Based on at least the foregoing reasons, therefore, Applicants respectfully submit that the cited art fails to anticipate or make obvious Applicants' invention, as claimed, for example, in

independent claims 47, 54, 56, 57, and 61. Applicants note for the record that the other rejections and assertions of record with respect to the independent and dependent claims are now moot, and therefore need not be addressed individually. Accordingly, Applicants do not acquiesce to any assertions in the Office Action that are not specifically addressed above, and hereby reserve the right to challenge those assertions in the future, if necessary or desired.

In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 20<sup>th</sup> day of December, 2004.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric M. Kamerath", with a stylized flourish at the end.

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